

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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THE UNITED STATES OF AMERICA,

v.

07-CR-212-A

WANG HE BIN,  
a/k/a Julie Wang, and  
HUANG YUE FENG,  
a/k/a Charlie,

Defendants.

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**GOVERNMENT'S MOTION TO  
ADJOURN DATES FOR SENTENCING**

**THE UNITED STATES OF AMERICA**, by and through its attorneys, Kathleen M. Mehltrittter, United States Attorney for the Western District of New York, and William J. Hochul, Jr., Assistant United States Attorney, hereby moves the Court to adjourn the date scheduled for sentencing, for reasons which follow.

1. On January 20, 2009, HUANG YUE FENG appeared before the Court and pleaded guilty to Count One of the Indictment (conspiracy to engage in trafficking in counterfeit merchandise).

2. On January 23, 2009, WANG HE BIN (Mr. HUANG's wife) appeared before the Court and pleaded guilty to the same count (conspiracy to engage in trafficking in counterfeit merchandise).

3. As part of both of their pleas, the defendants agreed to cooperate with the Government, in exchange for which the Government may file a motion for a reduction in sentence pursuant to United States Sentencing Guidelines section 5K1.1.

4. In order to afford the defendants a complete opportunity to receive the benefit of any Government motion for reduction of sentence, the Government continues to require cooperation from both defendants regarding those remaining in the above-captioned case (as of this date, nine defendants remain to be tried). The Government accordingly requests that the sentencing date for the defendants, currently scheduled for March 22, 2010, be adjourned for a period of ninety days so as to give the defendants a full opportunity to so cooperate.

5. Peter Verby, Esq., counsel for Ms. WANG, has informed the Government that neither defendant objects to the instant motion to adjourn the sentencing.

6. **WHEREFORE**, for all of the above reasons, the Government requests that the Court adjourn sentencings in this matter, currently scheduled for March 22, 2010 at 12:30 p.m. for defendant WANG HE BIN, and March 22, 2010 at 1:00 p.m. for defendant HUANG YUE FENG, and reschedule sentencing for a period of time

approximately ninety (90) days in the future as is convenient for the Court and the parties.

DATED: Buffalo, New York, February 25, 2010.

Respectfully submitted,

KATHLEEN M. MEHLTRETTER  
United States Attorney

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TO: Peter Verby, Esq.  
Fred Sosinsky, Esq.  
Michael J. Quarantillo, U.S. Probation Officer

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2010, I electronically filed the foregoing **GOVERNMENT'S MOTION TO ADJOURN DATE FOR SENTENCING** with the Clerk of the District Court using its CM/ECF system which would then electronically notify the following CM/ECF participant on this case:

Peter Verby, Esq.  
Fred Sosinsky, Esq.  
Michael J. Quarantillo, U. S. Probation Officer

s/Karen A. Brown  
KAREN A. BROWN